

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

DEBORAH S. SKEANS, Executrix
of the ESTATE OF FRANK E.
PAVLIS,

Plaintiff,

v.

KEY COMMERCIAL FINANCE,
LLC, KEY COMMERCIAL
FINANCE PROPERTIES, LLC,
EQUITY PROS, LLC, and MOBILE
AGENCY, LLC

Defendants.

No. 1:18-cv-01516-CFC-MPT

**DEFENDANTS' DESIGNATIONS AND PLAINTIFF'S COUNTER-
DESIGNATIONS FROM DEPOSITION TRANSCRIPT OF
DAVID SCOTT WYLLIE - MAY 7, 2020**

The parties hereby provide their designations and counter-designations to the deposition transcript of David Scott Wyllie from May 7, 2020. The parties hereby reserve the right to revise, amend, supplement, or modify these deposition designations based upon any pretrial rulings by the Court or to address any additional issues, arguments, evidence or other developments in the case, including edits to the draft pretrial order, any meet and confers or other negotiations between the parties, anticipated motions, and similar developments. The parties further reserve the right to supplement these designations to rebut or otherwise address deposition

designations, exhibits, or other facts identified by the other party (or parties). All irrelevant and redundant material, including objections and colloquy of counsel will be eliminated from the deposition designations below when the designations are read to the jury.

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